

1 L. JULIUS M. TURMAN (SBN 226126)

2 jturman@constangy.com

3 PHILIP J. SMITH (SBN 232462)

4 psmith@constangy.com

5 **CONSTANGY BROOKS SMITH AND PROPHETE LLP**

6 50 California Street, Suite 1625

7 San Francisco, California 94111

8 Telephone: (415) 918-3000

9 Facsimile: (415) 918-3007

10 Attorneys for Defendant

11 TARGET CORPORATION

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 GERALD FUSON,

15 Plaintiff,

16 vs.

17 TARGET CORPORATION, AND DOES 1
18 THROUGH 50

19 Defendants.

Case No. 4:17-cv-5353 MEJ

[Removal from Superior Court of California,
Alameda County Superior Court Case No.
RG17859726]

**JOINT STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

1 The parties to this action, acting through counsel and, pursuant to Federal Rule of Civil
2 Procedure 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement executed by
3 them, to the Dismissal With Prejudice of the above-entitled action, with each party to bear its own
4 attorneys' fees and costs.

5
6 Dated: November 22, 2017

MICHAEL I. REED, ATTORNEY AT LAW

7
8 By 

Michael I. Reed
Attorneys for Plaintiff
GERALD FUSON

9
10
11 Dated: November 22, 2017

CONSTANGY, BROOKS, SMITH & PROPHETE LLP

12 By 


L. Julius M. Turman
Philip J. Smith
Attorneys for Defendant
TARGET CORPORATION

13
14
15
16
17
18
19 ~~December 19, 2017~~ ~~[PROPOSED]~~ ORDER

20 On ~~November 22~~, 2017, the parties jointly submitted a Stipulation of Dismissal to the
21 Court. Accordingly, the instant matter is dismissed with prejudice, and the parties will bear their
22 own respective costs, including attorney fees and other litigation expenses.

23
24 IT IS SO ORDERED.

25
26 Dated: 12/19, 2017


HON. MARIA-ELENA JAMES.
United States District Judge